

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

JOHNNY M. HUNT,
Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243
Judge Campbell
Magistrate Judge Frensley

**RESPONSES AND OBJECTIONS OF DEFENDANT GUIDEPOST SOLUTIONS
LLC TO PLAINTIFF JOHNNY M. HUNT'S THIRD
SET OF INTERROGATORIES**

Defendant Guidepost Solutions LLC ("Guidepost"), by and through its attorneys,
Riley & Jacobson, PLC and Mintz & Gold LLP, hereby responds to Plaintiff Johnny M.
Hunt's Third Set of Interrogatories as follows:

GENERAL RESPONSES AND OBJECTIONS

Guidepost incorporates by reference the General Objections set forth in Plaintiff
Johnny M. Hunt's First & Second Set of Interrogatories and repeats them as if fully set
forth herein.

INTERROGATORIES

INTERROGATORY NO. 1. For each version of the Report that you produce
in this litigation, identify the date(s) that the version was created, the date(s) that
it was modified (if applicable), and who, if anyone, that version was shared with.
This request includes, but is not limited to, the following documents:
GP_000013-GP_000300; GP_000449-GP_000736; GP_000737-GP_001021;
GP_001033-GP_001324; GP_001325-GP_001612; GP_001613-GP_001900;
GP_001901-GP_002188; GP_002477-GP_002764; GP_002765-GP_003050;
GP_003051-GP_003338; GP_003339-GP_003625; GP_003634-GP_003921.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document production in this matter, identified by Bates GP_000001-GP_010790, and is therefore as easily obtained by Plaintiff as by Defendant. The documents Guidepost produced in this matter included metadata, and therefore Guidepost refers Plaintiff to its document production, identified by Bates GP_000001-GP_010790. In accordance with Guidepost's Engagement Letter, dated October 5, 2021, the only person or entity that received any version of the Report from Guidepost was the SBC Task Force. Furthermore, Guidepost is currently unaware that any of the above referenced bates numbers were shared with anyone.

INTERROGATORY NO. 2. For each draft of any section of the Report relating to Plaintiff that you produce in this litigation, identify the date(s) that such document was created, the date(s) that it was modified (if applicable), and who, if anyone, that draft was shared with. This request includes, but is not limited to, the following documents: GP_000338-GP_000349; GP_000350-GP_000362; GP_000363-GP_000374; GP_000377-GP_000388; GP_000389-GP_000400; GP_000410-GP_000412; GP_001025-GP_001032; GP_002189-GP_002476; GP_003939-GP_003941; GP_004061-GP_004063.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document production in this matter, identified by Bates GP_000001-GP_010790, and is therefore as easily obtained by Plaintiff as by Defendant. The documents Guidepost produced in this matter included metadata, and therefore Guidepost refers Plaintiff to its document

production, identified by Bates GP_000001-GP_010790. In accordance with Guidepost's Engagement Letter, dated October 5, 2021, the only person or entity that received the section of the Report related to Plaintiff from Guidepost was the SBC Task Force and the Committee on Cooperation. Furthermore, the Survivor and Survivor's Husband received only the section of the Report pertaining to their experiences with Plaintiff.

INTERROGATORY NO. 3. Identify by bates number all versions of the Report sent to the Cooperation Committee prior to May 22, 2022.

RESPONSE:

No version of the Report was sent to the Cooperation Committee prior to May 22, 2022.

INTERROGATORY NO. 4. Identify by bates number all versions of the Report sent to the Task Force prior to May 22, 2022.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it is overbroad and unduly burdensome. Guidepost further objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document production in this matter, identified by Bates GP_000001-GP_010790, and is therefore as easily obtained by Plaintiff as by Defendant.

INTERROGATORY NO. 5. State the total amount of money you billed for your work on the Report and the total amount of money you were paid for that work.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it vague, overbroad, and ambiguous. Guidepost further objections to this interrogatory on the ground that it seeks information that is not relevant to any issue in this case.

INTERROGATORY NO. 6. Did anyone from the SBC, the Executive Committee, the Task Force, the Cooperation Committee, or any other third party (i.e., someone unaffiliated with Guidepost) provide comments, suggestions or other feedback on any draft of the Report prior to May 22, 2022? If so, identify who; the date of such comments, suggestions, or feedback; the manner in which such comments, suggestions, or other feedback was provided; and the substance of such comments, suggestions or other feedback.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document production in this matter, identified by Bates GP_000001-GP_010790, and is therefore as easily obtained by Plaintiff as by Defendant. The documents Guidepost produced in this matter included metadata, and therefore Guidepost refers Plaintiff to its document production, identified by Bates GP_000001-GP_010790. Subject to and without waiving the foregoing objections, the only person or entity that provided comments or feedback to the draft Report were: (i) the Task Force, (ii) the Committee on Cooperation for factual edits to draft sections of Report and never the entire Report, and (iii) Survivor and Survivor's Husband, and only to the section of the Report pertaining to their experiences with Plaintiff.

INTERROGATORY NO. 7. Identify and describe all documents or other materials relating to the allegations against Plaintiff in the Report that you requested from Complainant, her husband, Roy Blankenship, or any other person and state whether or not such materials were provided to you.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document

production in this matter, identified by Bates GP_000001-GP_010790, and is therefore as easily obtained by Plaintiff as by Defendant.

INTERROGATORY NO. 8. Identify each document cited in a footnote in the section of the Report relating to Johnny Hunt by (1) bates number and (2) the footnote number used in the final Report.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document production in this matter, identified by Bates GP_000001-GP_010789, and is therefore as easily obtained by Plaintiff as by Defendant. The documents Guidepost produced in this matter included metadata, and therefore Guidepost refers Plaintiff to its document production, identified by Bates GP_000001-GP_010790. Guidepost further objects to this interrogatory on the basis that footnote 435 and 438 are website articles and are therefore as easily obtained by Plaintiff as by Defendant. Additionally, Guidepost further objects to this interrogatory on the ground that such documents for other footnotes were just recently produced via an Attorney's Eyes Only designation after this Court's Order entered on November 22, 2023 (ECF Doc. No. 76).

INTERROGATORY NO. 9. Identify all persons or entities unaffiliated with Guidepost who was provided a copy of any version of the Report or draft section of the Report prior to May 22, 2022, and the date such copy or draft section was provided to such person or entity. This request includes, but is not limited to, any copy or draft section provided to (a) the Cooperation Committee, (b) the Task Force, (c) the SBC, and/or (d) the Executive Committee.

RESPONSE:

Guidepost objects to this interrogatory on the ground that it seeks information that is in the possession, custody, and control of Plaintiff, via Guidepost's document

production in this matter, identified by Bates GP_000001-GP_010789, and is therefore as easily obtained by Plaintiff as by Defendant. The documents Guidepost produced in this matter included metadata, and therefore Guidepost refers Plaintiff to its document production, identified by Bates GP_000001-GP_010790. Guidepost further objects to this interrogatory on the ground that it vague, overbroad, and ambiguous. Subject to and without waiving the foregoing objections, the Survivor and Survivor's Husband received only the section of the Report pertaining to their experiences with Plaintiff. Furthermore, in accordance with Guidepost's Engagement Letter, dated October 5, 2021, the only person or entity that received any version of the Report or section of the Report from Guidepost was the SBC Task Force and Committee on Cooperation.

Dated: January 10, 2024

Respectfully submitted,

s/ John R. Jacobson

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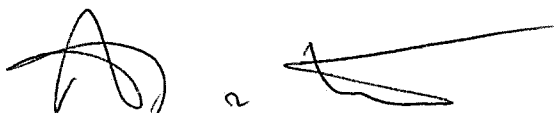
Attorneys for Guidepost Solutions LLC

VERIFICATION

1. I, Anthony M. Collura, am Chief Operating Officer and Chief Legal Officer at Guidepost Solutions LLC, a defendant in the above-entitled action.

2. I have read the Responses and Objections of Defendant Guidepost Solutions LLC ("Guidepost") to Plaintiff Johnny M. Hunt's Third Set of Interrogatories (the "Responses") and know the contents thereof. Based upon the records maintained by Guidepost, and/or on information furnished to me by employees of Guidepost, I declare under 28 U.S.C. § 1746 under penalty of perjury that the foregoing answers to those interrogatories are true according to the best of my knowledge, information, and belief.

Executed at New York, New York on the 10th day of January, 2024.



Anthony M. Collura

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by electronic mail on the following:

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on this 10th Day of January, 2024.

s/John R. Jacobson